

PAUL
HASTINGS

September 24, 2024

VIA ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Robert Menendez, et al.*, S4 23 Cr. 490 (SHS)

Dear Judge Stein:

We respectfully write to request, on behalf of Senator Menendez, a two-week extension on the deadline to submit a reply in further support of Senator Menendez's Rule 29 and Rule 33 motions. The deadline is currently scheduled for tomorrow, September 25, and we are requesting until October 7 to file our reply.

In response to the opening briefs filed by Senator Menendez (which was 45 pages long) and his codefendants, the government filed on September 19 (one month after service of the defendants' briefs) a 149-page opposition brief. Based on our preliminary review, the government's opposition contains numerous inaccuracies and misstatements that require response. Under Local Criminal Rule 49.1(a)(2), Defendants' deadline to reply is 7 days after service of the opposition briefs, which would be tomorrow. An additional 10 days, until October 7, would permit us sufficient time to properly analyze and respond to the government's arguments in opposition. Nor would it delay sentencing, which the Court adjourned yesterday until January 29, 2025.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Adam Fee

Adam Fee
Avi Weitzman

Attorneys for Defendant Robert Menendez